

K&L GATES

June 23, 2025

By ECF

The Honorable Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW

Dear Judge Woods:

On behalf of Defendants Vadim Wolfson and Gannon Bond, I write to request a brief stay of all pending pretrial deadlines, including but not limited to those contained in the Court's recent scheduling order (ECF No. 210). As reflected in the government's recent filing (ECF No. 218), which requested an adjournment of a suppression hearing and a stay of deadlines associated with that hearing, the parties are discussing a pretrial disposition. The Court has directed the government to provide a status update by June 25, 2025. ECF No. 220. Defendants anticipate providing their position in that status update regarding further extensions, if any, of the requested stay of all pretrial deadlines. Defendants are not at this time seeking to move the scheduled trial date and instead are seeking a brief window in which to continue discussions with the government without ongoing filing deadlines. The government does not oppose this motion.

Respectfully submitted,

/s/ David Rybicki
David Rybicki

Counsel for Vadim Wolfson